

1 tell him I would go and meet with him later just to
2 get away.

3 And then I immediately went to Joya. She
4 was the first person I saw, and told her that Steve
5 had tried to ask me to go up to his hotel room.
6 And before I could say anything else, she said,
7 "Get used to it kid. If I had a dollar for every
8 time I was sexually harassed at ESPN, I would be a
9 millionaire."

10 And Jeremy was sitting right there when
11 she said it, and you could ask him. And then I got
12 really upset, and kind of just went and sat by
13 myself for a little bit.

14 Q. How much had you had to drink up to this
15 point?

16 A. One drink.

17 Q. What type of drink?

18 A. Small Screwdriver.

19 Q. Were you intoxicated at this point?

20 A. Absolutely not.

21 Q. Were any of your senses impaired in
22 anyway --

23 A. Absolutely not.

24 Q. -- as a result of the alcohol you had

1 I was downstairs for awhile just sitting there
2 listening to people talk.

3 Q. What did you tell Doug Adkins and Donna
4 Hricisko next?

5 A. I told them that I went to his room.
6 That he had a suite. And they asked me why I went
7 -- why I went into the room, and I said he didn't
8 really offer me a choice. He opened the door and
9 said, "Look just come into the suite and talk. I
10 don't want to stand out in the hallway and have
11 this conversation."

12 So I went in, and he had opened the door
13 to show me that he had a table, and kind of a
14 separate sitting area in the suite.

15 Q. Then what did you tell Mr. Adkins and Ms.
16 Hricisko?

17 A. I believe I said, "I don't want to get
18 into the details much more of what happened in St.
19 Louis."

20 And Doug kind of questioned me and said,
21 "Are you sure you don't want to talk any" -- "you
22 don't want to discuss anything more than what
23 happened?"

24 I just said, you know, as far as I'm

1 concerned, it was just a lot of me saying no and
2 just trying to get my apology and get out of there,
3 and I would rather just leave it at that.

4 And he said, "Steve described it as the
5 two of you guys getting naked together."

6 And I said, "Once, again, I would rather
7 just leave it at there was a lot of me saying no
8 and just move on from this." I said, "Unless it's
9 something you absolutely need to know about."

10 I just felt really uncomfortable with
11 Doug, and I didn't really want to talk anymore
12 about St. Louis.

13 Q. Why did you feel uncomfortable with
14 Doug?

15 A. The way in which he was asking me
16 questions, it just seemed very -- he was not taking
17 any notes. He was just sitting there staring at me
18 the whole time, and he had this look on his face
19 that was just like very negative, and very kind of
20 like he was looking down at me. Very demeaning in
21 how he spoke to me.

22 Like when he asked me questions, he just
23 didn't -- almost like -- he kind of rolled his eyes
24 a little bit when he would ask me a question. Like

1 know how else to describe it.

2 Q. Nothing -- it didn't cross your mind that
3 it might relate to anything else other than
4 dropping off the letter?

5 MR. HAYBER: Objection to the form. You
6 just mischaracterized her testimony.

7 THE WITNESS: Dropping off the letter,
8 and his feelings that I was pursuing him to some
9 degree.

10 (BY MR. BERTRAND):

11 Q. What did you next tell Mr. Adkins and Ms.
12 Hricisko?

13 A. I mean, they asked me questions back and
14 forth. It wasn't a -- they kind of like led me
15 into the next question, and I would answer. So
16 it's a little harder to...

17 Q. Okay. Can you tell me what was asked,
18 and what your responses were?

19 A. I don't know if these are in the exact
20 order as things happened. But I know that Doug had
21 said that -- he had asked me if I had spoken with
22 his wife and his kids or any member of Steve's
23 family. I said, "I had not."

24 Doug said, "Steve says that his wife is

1 stuff on my own. That I was going to legal service
2 to get a restraining order, and see what my options
3 were in that regard.

4 And we did -- we did talk about the
5 letter as well. Doug did ask me directly about
6 what happened. Did I drop a letter off at Steve's
7 house?

8 Q. What questions were you asked about the
9 letter?

10 A. Did I drop the letter off at Steve's
11 house.

12 Q. And what did you say?

13 A. I said, "Yes, I did."

14 And Doug said can you tell me what
15 happened there or something along the lines of, can
16 you just go into more detail about -- about what is
17 in the letter, and what happened.

18 And I told them -- and I should say as
19 I'm telling you these things, this may not be in
20 the order. This is just topics that I know we
21 talked about.

22 But we talked about the letter and I
23 said, you know, I've written something to his wife.
24 At this point, I was trying to get him to leave me

1 alone. He was still pursuing me. I thought maybe
2 if I said some stuff to his wife, because I still
3 have no idea whether she knows what is going on or
4 if people said anything to her.

5 So I put it all in a letter, and I said a
6 lot of it is crap. I said a lot of stuff just to
7 kind of make it seem like we have some great
8 relationship. Just to make things at home suck for
9 him, because right now things really suck for me at
10 work.

11 And that I had went and dropped it off,
12 and then I wasn't sure if it was even the right
13 house. That I had gone down to kind of the YMCA
14 area, and just kind of trying to figure out -- I
15 wonder if maybe somebody here knows the Phillips.
16 It was a small town. I'm sure everybody knows
17 everybody.

18 I stopped and asked some girl if she knew
19 what the Phillips -- who the Phillips were. I knew
20 he had some teenage boys. And she said, "yeah". I
21 had said -- I kind of asked her if she knew where
22 they lived. I wanted to make sure I had the right
23 house, and she knew how to get up there. She said,
24 yes. I asked her -- I said, hey, you know, I

1 don't -- I have some stuff from ESPN, and I don't
2 think I dropped off the right thing. Can you -- it
3 was in an ESPN envelope so.

4 I said, would you mind -- if I gave you
5 10 bucks, would you mind going up there and just
6 grabbing it back for me. I don't want them to
7 think somebody is lurking around their house or
8 whatever. Someone who they are familiar with can
9 just run up and grab the letter and come back.

10 First she said yes, and I thought she was
11 going to do it. And then Doug stopped me. He
12 said, "\$10, why would anybody do that for \$10?"
13 And I thought really this is the question you're
14 asking me right now? Like who cares about \$10.
15 That is how much I offered her.

16 It kind of threw me off track for a
17 second, because I had started to say -- at that
18 point I had said, but she changed her mind. But he
19 cut me off mid sentence, and then I went back to it
20 and said anyhow when I drove up there, I didn't
21 even get a chance to get the letter back.

22 You know, I went to park my car, and
23 immediately some truck came up the hill. At that
24 time I was under the impression it was Steve in

1 that car, because he had driven it before. The
2 windows were dark. I couldn't see who was driving.

3 I said I went to move my car, because I
4 thought maybe I should not be parking there because
5 it was way down from the house. You couldn't see
6 the house from where I parked. But I didn't know
7 whose area that really was. If it was part of
8 their house or not.

9 Anyhow, I went to move my car and the car
10 -- the truck like rammed towards me, which scared
11 the crap out of me, and which made me really think
12 this is Steve because he knows what my car looks
13 like. And I backed up and I tapped a column, and I
14 just raced out of there. I just left the letter.
15 I didn't even want to fool with what was going on.
16 I just wanted to get out of there.

17 Q. Let's talk about this letter a little bit
18 more.

19 A. Yes.

20 Q. So on August 19th you had a letter in
21 hand that was in an ESPN envelope?

22 A. I believe so. It was whatever I had at
23 my house. But I'm positive that I just had some
24 ESPN envelopes laying around and put it in there.

1 Q. But I'm actually talking about the
2 incident at the Phillips' house after you left.
3 You said you went home. You packed. You received
4 a call from the police. You received a threatening
5 call. You spoke to the police about the
6 threatening call you received.

7 Did you do anything else or have any
8 other -- anything else related to the incident that
9 had occurred earlier in the day at the Phillips'
10 home?

11 A. No.

12 Q. Isn't it true that you contacted Ryan
13 Phillips that same day and asked about the incident
14 at the home?

15 A. No, I did not.

16 MR. BERTRAND: Let's mark this as our
17 next Exhibit. Exhibit No. 5.

18 (Whereupon, Exhibit 5, Handwritten Notes
19 from meeting on August 20th, marked for
20 identification)

21 (BY MR. BERTRAND):

22 Q. I am showing to you what has been marked
23 as Exhibit No. 5. These are handwritten notes
24 taken by Donna Hricisko at your meeting on August

1 -- I mean, once I saw her name, I was familiar with
2 who she was. Bristol is a very small place. I
3 don't know if we had just a little bit of a side
4 conversation or not about just ESPN. Like I said,
5 I was familiar with her name. I do know that we
6 agreed on a place to meet, which was a grocery
7 store to call.

8 (BY MR. BERTRAND):

9 Q. Did you list your advertisement on
10 Craigslist under your own name?

11 A. You don't put a name. You don't sign
12 anything on Craigslist. It's just a posting, and
13 it scrambles -- it automatically scrambles your
14 e-mail address.

15 Q. When you communicated with Ms. Courtney
16 Arp by e-mail, did you identify to her who you
17 were?

18 A. No, not my real name.

19 Q. Okay. When you communicated with Ms.
20 Courtney Arp and you recognized her name, did you
21 explain to her that you knew who she was? Tell her
22 who you were?

23 A. I explained that I worked at ESPN, and I
24 knew that she knew some people -- she helped some

1 people out at ESPN. It's a running joke about her,
2 that she sold weed, but I didn't go into -- no, I
3 didn't like personally introduce her as here is my
4 name.

5 Q. Did you provide her with another name?

6 A. My e-mail account is an account -- I have
7 a regular G-mail account that I use for
8 professional purposes, and I have a hot mail
9 account which I have had since fifth grade or sixth
10 grade, whenever people first got e-mails, that I
11 use mostly for spam stuff. For purchases on line.
12 For things that I don't want in my professional
13 e-mail account.

14 Whatever name is in there, was whatever I
15 came up with in sixth grade that I thought was cool
16 to have a display name or whatever. I think when I
17 e-mail from that account, it says Kelly
18 something.

19 Q. Is that Kelly Burns?

20 A. Yes, I'm pretty sure that is what it
21 says.

22 Q. Who is Kelly Burns?

23 A. A name I made up in the sixth grade.
24 It's not a person.

1 I mean that was the point of it, to stop all of
2 this.

3 Q. When you went home to shower and change,
4 if you had not received the call -- or excuse, the
5 text from Mr. Phillips, what would you have done?

6 A. I have no idea.

7 Q. Was it your plan to go and meet him at
8 the Target parking lot?

9 A. I honestly can't tell you what I would
10 have done, because it didn't happen. I know I had
11 no idea what I was going to do. I was going home
12 thinking, crap, now I have to go to this meeting.
13 The whole point was that I didn't intend to go to
14 this meeting. I didn't have any plan for this not
15 to work.

16 Q. Why didn't you send him a text saying I
17 can't meet you tonight?

18 Because at this point --

19 MR. HAYBER: Objection to the form.

20 THE WITNESS: At this point, Steve is
21 getting angrier and angrier about the fact that I
22 had not had sex with him, like full on intercourse
23 with Steve. Okay. And the more I spend time with
24 him, the more aggressive he gets about this fact.

1 Me saying "no" is going to be even more
2 of a problem for me the next day. I would rather
3 just go and try to figure out some other way to
4 make the situation -- some way to talk to him.
5 Maybe try and talk him out of it. I don't know.

6 Like I just -- it didn't make a
7 difference if I said I can't go. He would still
8 being sending me texts saying we are going to meet
9 soon or I'm going to see you soon. It's not going
10 to do anything for me. It is not going solve my
11 situation.

12 Q. Had you already had the two sexual
13 encounters with Mr. Phillips in the Target parking
14 lot when this occurred?

15 A. Yes.

16 Q. So when you left Ms. Arp that evening,
17 your intent was to go meet Steve Phillips at the
18 Target parking lot yet once again?

19 A. Yeah, he told me he only had 10 minutes.
20 So I was hoping we only have ten minutes. Maybe I
21 can just talk to him for most of those 10 minutes,
22 because he had sent me that text that said, yeah, I
23 can meet you, but it's only going to be for like 10
24 minutes.

1 MR. HAYBER: Objection to the form of the
2 question.

3 THE WITNESS: No. A gossip article is
4 not consistent with my statements that I made.

5 (BY MR. BERTRAND):

6 Q. Did you contact Mr. Phillips' son on
7 Facebook?

8 A. No -- uh, yes. Not on the ESPN
9 computer.

10 Q. Did you mention during the course of your
11 interview on August 20th, having contacted Mr.
12 Phillips' son on Facebook?

13 A. No, because -- I have to clarify how you
14 use the word "contact". Friending somebody,
15 sending a friend request in a message that was not
16 reciprocated or accepted in any way, to me does not
17 constitute contact. Contact to me is getting some
18 sort of a response back.

19 Q. Did you explain that to Doug Adkins or
20 Ms. Hricisko during your meeting with them on
21 August 20th?

22 A. They didn't ask me if I had contact.
23 They asked me did you talk to the wife or the kids?
24 I said no, I didn't talk to the wife or the kids.

1 Q. Did you explain to them that, while you
2 might not have spoken to them personally in person
3 or on the phone, you reached out to them via
4 electronic means?

5 MR. HAYBER: Objection to the form of the
6 question.

7 THE WITNESS: Can you ask that again?

8 (BY MR. BERTRAND):

9 Q. Sure. Did you clarify for them that
10 while you did not talk to them, that you had
11 contacted the son via Facebook?

12 MR. HAYBER: Objection to the form of the
13 question.

14 THE WITNESS: I did not tell them that
15 while at home, I friend requested Steve's son. No,
16 I did not.

17 (By MR. BERTRAND):

18 Q. Is that all you did is friend request
19 Ryan Phillips?

20 A. Yes. I made an account, and I sent him a
21 request with a message, because I wanted him to
22 friend me, so I could see if he had a phone number.
23 That was the extent of my conversation with the
24 Phillips' kid.

1 Q. That was the only communication you've
2 ever had with Ryan Phillips, is a friend request?

3 A. Friend request, and message -- a message
4 with the friend request.

5 Q. What was the message?

6 A. Something about -- it's in one of the
7 statements. Something about I needed to get in
8 touch with his parent. I needed to get a phone
9 number from his parent. He says it accurately, and
10 I don't --

11 MR. HAYBER: He's just asking you what
12 you remember. If he wants you to look at a
13 document, he'll show it to you.

14 THE WITNESS: That is the best I can
15 remember.

16 (BY MR BERTRAND).

17 Q. That was the one and only occasion that
18 you communicated with Ryan Phillips?

19 A. Yes, it was.

20 Q. Did you read the statement that is
21 referenced in Exhibit 16, where it says statement
22 from their teenage son?

23 A. I did.

24 Q. Did you see in that statement that it

1 referred to not just one communication, but that
2 there had been multiple communications?

3 A. I noticed he referenced an entirely
4 different non-Facebook conversation with somebody
5 who he thought might be me.

6 Q. Was it you?

7 A. No.

8 Q. What was -- when you contacted Ryan
9 Phillips on Facebook, what name did you use?

10 A. Caroline something. It was one of his
11 friends.

12 Q. This was not a name you made up in 5th
13 grade?

14 A. No.

15 Q. Caroline who?

16 A. It was just -- I looked through one of
17 his friends, and I just copied and pasted a photo
18 and a name into the account that I have on the
19 side. I just -- I usually use it at home for the
20 fans of the Facebook fan pages to go in and make
21 sure everything works and stuff.

22 I literally just made it, copied it, and
23 friend requested him with a message, and then -- I
24 think he accepted. I looked and saw at some point

1 -- this was within like 24 hours. He accepted. I
2 looked to see if there was a phone number. That
3 was it. I never had any conversations with him on
4 that account.

5 Q. What do you mean when you say on that
6 account? Did you have conversations with him on
7 any other account?

8 A. No, on any account.

9 Q. So you contacted him using an alias or
10 under the name Caroline?

11 A. Caroline something, yes.

12 Q. You said that this is a real person, this
13 Caroline?

14 A. Yes.

15 Q. And you impersonated her?

16 A. Yes.

17 Q. And how did you know that Ryan and this
18 Caroline knew each other?

19 A. I literally went through his friends and
20 picked out a girl and made an account, an exact
21 same account.

22 Q. When you say you went through his
23 friends, what do you mean?

24 A. His page is open. You can see who he's

1 friend's with and all their associated pages. So I
2 picked one that was also open and copied it.

3 Q. And you went to his friend's page on
4 Facebook?

5 A. Yes.

6 Q. When you say you copied this Caroline's
7 page, you copied all the information about
8 Caroline?

9 A. There wasn't that much on there. It was
10 just high school student, name --

11 Q. I didn't ask you that information. I
12 said that you copied her information? You
13 impersonated her on Facebook?

14 A. That is a different question, but yes, I
15 impersonated her on Facebook.

16 Q. You took her personal information and
17 created a fake account?

18 A. Two or three things. Not all of her
19 information.

20 Q. And did what with it?

21 A. Copied it onto the other account.

22 Q. Created a fake account?

23 A. Yes.

24 MR. HAYBER: Hasn't she answered this

1 question about five times already? Do you get it
2 yet?

3 (BY MR. BERTRAND):

4 Q. Then after you created this fake Facebook
5 account, you contacted Ryan Phillips and pretended
6 to be Caroline?

7 A. Yes. I sent a message from that account
8 with a friend request.

9 Q. Did you raise any of this during your
10 August 20th meeting with Mr. Adkins and Ms.
11 Hricisko?

12 A. Considering I did not talk to the son or
13 have any two-way conversation, I didn't feel it was
14 necessary, no.

15 Q. Why did you not think it was necessary?

16 A. Because I did not really see the point.
17 It was something I did at home that had nothing to
18 do with ESPN. That wasn't a two-way conversation.
19 It didn't relate to the questions that they were
20 asking, and I didn't even find a home number on
21 that account that I actually used to make any phone
22 calls. So as far as I was concerned, it was a
23 pointless action on my end. It didn't result in
24 anything.

1 Q. Were you told in your August 20th meeting
2 that Mr. Phillips had claimed that you were
3 stalking him?

4 A. Stalking him? Pursuing him is what I was
5 told.

6 Q. In the nature of you being told that you
7 -- that the claim was that you were pursuing him,
8 did you think -- why did you decide not -- let me
9 rephrase.

10 In connection with the allegation being
11 made against you that you were pursuing him, why
12 didn't you feel it wasn't relevant to let Ms.
13 Hricisko and Mr. Adkins know that you had tried to
14 contact Mr. Phillips' son under false pretenses?

15 MR. HAYBER: Objection to the form of the
16 question.

17 THE WITNESS: What does me friend
18 requesting Ryan Phillips have to do with me
19 pursuing Steve Phillips for a physical
20 relationship? Absolutely nothing. That is why I
21 did not.

22 (By MR. BERTRAND):

23 Q. Can you flip to the second page of that
24 article? Can you take a look at the fourth

1 paragraph down? It states quote, "Then Marni
2 Phillips told the cops on the night of August 5th,
3 she began repeatedly receiving harassing phone
4 calls and text messages from a woman who claimed to
5 have information about her husband."

6 Do you know who that person was that was
7 sending messages to Marni Phillips?

8 A. I do not.

9 Q. Do you know who it might have been?

10 A. Maybe Courtney, but I don't know.

11 Q. You met with Ms. Courtney Arp prior to
12 August 5th; right?

13 A. I want to say it is August 5th, but that
14 is the night that we tried his office phone.

15 Q. So the same day you met with Courtney
16 Arp, and you paid her either \$50 or \$100, is the
17 same night that Marni Phillips claims that she
18 started receiving harassing phone calls and text
19 messages?

20 A. In this article, yes. I was not given
21 dates or times when asked by ESPN.

22 Q. Can you take a look at two paragraphs
23 below that? Quote, "On August 16th, Marni said
24 Hundley left her quote, a detailed and very

1 disturbing message on my cell phone, and a text
2 message late that night." End quote.

3 Did you -- that's the same voice mail
4 message that you were referring to earlier? Let me
5 rephrase that.

6 Did you leave Marni Phillips a voicemail
7 message on August 16th?

8 A. I don't know when I left a voicemail
9 message. I know I left one, ever. I couldn't tell
10 you what day it was.

11 Q. And according to this news report, this
12 was a detailed and very disturbing voicemail
13 message. Do you disagree with that
14 characterization?

15 A. If it's the voicemail that I left, then
16 yes, I would.

17 Q. What is the voicemail message you left?

18 MR. HAYBER: Asked and answered.

19 THE WITNESS: Yes. We've already been
20 through this.

21 (By MR. BERTRAND):

22 Q. I just want one more time under oath for
23 you to tell me what is the message?

24 A. I just remember it being very factual.

1 That I needed to speak with her.

2 Q. What was the message?

3 A. I don't remember it exactly. You expect
4 me to remember something that happened three
5 years -- exactly the words I used?

6 I know I was pretty adamant about you
7 need to call me. Here is my phone number. You
8 know, I work with Steve.

9 Q. What else do you recall? You need to
10 call me. I work with Steve --

11 A. It's important.

12 Q. It's important.

13 A. That is the extent of it. I honestly --
14 I don't -- I didn't even know if it was a working
15 number. So I don't -- I don't remember how much
16 information I gave or didn't give. It was my own
17 last ditch attempt to try to reach somebody.

18 Q. Isn't it true you told Marni Phillips
19 during this -- when you left that message that her
20 husband was having a sexual affair?

21 A. I may have. That is a pretty factual
22 statement.

23 Q. Yes?

24 A. I could have. You're expecting me to

1 remember this like word-for-word, and I'm telling
2 you I don't.

3 Q. No. I'm not asking word-for-word. I'm
4 questioning your general recollection about what
5 were the contents of that voicemail message?

6 A. I'm sure I probably did say he's having
7 an affair. It's important. Please call me. Like
8 it was a serious matter.

9 Q. Did you tell Ms. Phillips that you were
10 the person that was having the affair with her
11 husband?

12 A. I don't know. I don't remember.

13 Q. Let's talk about the text message that
14 you left for Marni Phillips. What did you text
15 her?

16 A. I don't even remember texting her.

17 Q. You had her phone number, and you texted
18 her. What did you text her? What is your best
19 recollection about the text you sent her?

20 A. I don't remember even texting her.

21 Q. You're not denying that you did text Ms.
22 Phillips, are you?

23 A. I don't recall texting her. I can't --
24 this is -- I mean this is -- I feel like if I had

1 texted her, it would have been in the police
2 report. There would have been evidence. I don't
3 know how a text message has a tone. It does not
4 say what I sent her. It says what the tone of the
5 text message was.

6 Q. Isn't it true that you left her a text
7 message that essentially said I care about Steve.
8 I make him happy, and we both can't have him?

9 A. I don't even recall leaving her a text
10 message.

11 Q. When you met with --

12 A. This is --

13 Q. When you met with Mr. Adkins and Ms.
14 Hricisko, and they asked you about whether or not
15 you had contacted --

16 A. Once again, that is not what they asked
17 me.

18 MR. HAYBER: Let him finish his
19 question.

20 (By MR. BERTRAND):

21 Q. What did they ask you specifically?

22 A. The only comment -- question they asked
23 me about Steve's wife, was to tell me that Steve
24 said his wife said someone has repeatedly been

1 Emily Curtis? You see that reference there?

2 A. I see that.

3 Q. Do you know who Emily Curtis is?

4 A. I have no idea.

5 Q. Do you know who riotgirrr4life is?

6 A. I have no idea. I haven't used AOL since
7 I was like 16.

8 Q. Did you have any conversations with
9 Courtney Arp about possibly communicating with Ryan
10 Phillips?

11 A. Absolutely not.

12 Q. Do you see reading down that paragraph
13 that the officer reports that Ryan Phillips told
14 him that he had received several Facebook friend
15 requests from a Brooke Hundley?

16 A. Yes.

17 Q. Did you attempt to contact Ryan directly
18 under your own name?

19 A. Yes. Originally before I ever made
20 anything, I tried to just friend request him to see
21 if he would accept. So I could see if he had a
22 phone number. I mean, you can only send one. You
23 either accept it or reject it.

24 Q. Did you tell Doug Adkins and Donna

1 Hricisko on August 20th that you had made attempts
2 to contact Ryan Phillips directly?

3 A. I had not made attempts to contact. I
4 don't really understand.

5 Q. Sure. I'll rephrase. On August 20th
6 when you met with Doug Adkins and Donna Hricisko,
7 did you tell them that you had tried to friend
8 request Ryan Phillips on Facebook?

9 A. No. I friend request a lot of people on
10 Facebook.

11 Q. How did you find out Ryan Phillips had a
12 Facebook account?

13 A. I'm sure I just looked for his name.

14 Q. Where did you do that search?

15 A. At home when I built the page.

16 Q. Did you ever do any search for Ryan
17 Phillips or any member of the Phillips family on
18 Facebook from work?

19 A. The only thing I searched for -- I
20 searched Phillips at work, because I was looking to
21 see if anybody -- you can make Facebook fan pages
22 for anybody, celebrities and whatnot, and I know I
23 searched -- there's a lot of pages that says I hate
24 Steve Phillips with a lot of comments on them up

1 there. And I looked at a lot of them to see if
2 there were any people who actually met Steve
3 Phillips, and had comments to say about him.
4 Whether there were other women. That is what I was
5 looking for.

6 Q. You were just looking for the Steve
7 Phillips Facebook pages?

8 A. Yes, comments from other people about
9 Steve Phillips.

10 Q. Isn't it true that through your ESPN work
11 computer that you also reviewed Ryan Phillips'
12 Facebook page?

13 A. Not that I am aware of.

14 Q. What do you mean when you say not that
15 you're aware of? Is it that you don't recall or
16 you did not do that?

17 A. No, I didn't do that.

18 Q. Do you see in Ryan Phillips' statement,
19 as recorded in this exhibit, where he states that
20 he requested or -- excuse me, he accepted a friend
21 request from Caroline Muirhead?

22 A. Yes.

23 Q. Is Caroline Muirhead the alias or person
24 you were impersonating in order to communicate with

1 Ryan Phillips?

2 A. Yes, it was.

3 Q. And it's true that Ryan Phillips accepted
4 your friend request?

5 A. Yes.

6 Q. And is it true that you earlier testified
7 today that he did not accept your friend request?

8 A. No. I said he did not accept my Brooke
9 Hundley friend request. He did accept the Caroline
10 one. I looked. He didn't have a phone number, and
11 that was the extent of my involvement with him on
12 Facebook.

13 Q. So all of your earlier testimony today
14 about the communications and limited scope of your
15 communications with Ryan, was that just related to
16 you trying to contact him as Brooke Hundley?

17 MR. HAYBER: Objection to the form of the
18 question. She can't possibly be asked to recall
19 every question you asked her.

20 MR. BERTRAND: I will withdraw the
21 question.

22 (BY MR. BERTRAND):

23 Q. Tell me about all your communications
24 with Ryan Phillips either as Brooke Hundley or any

1 other person that you impersonated?

2 A. I sent friend requests under Brooke
3 Hundley Facebook account that he never accepted.
4 So then I -- while I was home, I looked at his
5 friends. Found somebody, picked a random girl he
6 was friends with, built a page -- it just had
7 literally her name, Wilton high school. I don't
8 know if it had anything other than that, and then a
9 photo.

10 I didn't put all her -- all of the stuff
11 that is actually on her page, and friend requested
12 him with the message that said something along the
13 lines of, like my parents need to get in touch with
14 your mom or dad. I need a home phone number, kind
15 of a thing. He accepted that -- didn't reply back
16 to the message. I looked at his page. It didn't
17 have a number -- didn't have any home phone number
18 listed. That was it.

19 Q. No other communication?

20 A. That is the only contact I had with Ryan
21 Phillips.

22 Q. Can you continue reviewing down on
23 Exhibit 18. The sentence that begins "he went on
24 to explain"?

1 A. Yes.

2 Q. You see where I am? I am going to read
3 into the record. Quote, "He went on to explain
4 that on 8-19-09 after the incident in the driveway
5 with his mother and -- " Excuse me. I'll start
6 again.

7 "He went on to explain that on 8-19-09
8 after the incident in the driveway with his mother
9 and Brooke, he received another instant message
10 from riotgirrr4life. The message explained that he
11 had gone to --that she had gone to their house to
12 see how nice it was, and got scared when his mother
13 pulled into the driveway. She panicked, then
14 accidentally hit her car into the stone pillar in
15 the driveway. She then asked him if her mom called
16 the police, because she was using her cousin's car
17 from California and did not want her family to get
18 mad at her."

19 Did you communicate with Ryan Phillips
20 about the incident that occurred in the driveway?

21 A. No, I didn't.

22 Q. Do you have any idea of who this person
23 could have been that was communicating with Ryan
24 Phillips about this?

1 Craigslist thing, and even Courtney says -- I did
2 the Craigslist thing. She responded. I wrote her
3 a script and sent it, and we went to the grocery
4 store. It was all at once. This leads me to
5 believe this was before the second meeting, when I
6 was thinking about calling her myself.

7 Q. Before you met with Courtney Arp and
8 planned to have -- contacted Marni in an attempt to
9 have her contact you, had you thought about doing
10 it previously?

11 A. Not about hiring someone to do it. I
12 thought about maybe I could make a phone call to
13 her myself.

14 Q. Why did you decide not to do it that
15 way?

16 A. The whole reason I'm doing everything. I
17 don't want Steve coming after me. As soon as I put
18 my name in it, God only knows what is going to
19 happen to me. I'm dealing with a rapist here.
20 It's not like -- This guy's pretty much willing to
21 do whatever it takes to shut me up, and has said
22 so.

23 Q. What is your definition of a rapist?

24 A. Somebody who sexually assaults or

1 attempts to sexually assault somebody.

2 Q. Was he a rapist just because he grabbed
3 your breast?

4 A. No.

5 Q. Why isn't that rape?

6 A. To me, that is just sexual misconduct.
7 Once it becomes -- and at that point I told him no.
8 I mean, when I -- once you say no and then someone
9 does it again, to me that becomes an assault. Once
10 the line is drawn that you do not want any sort of
11 physical contact.

12 Q. Was it a sexual assault the first time
13 you met in the Target parking lot?

14 A. Yes.

15 Q. Was it an assault the second time you met
16 in the Target parking lot?

17 A. Yes. When he's putting his hands on me,
18 and I'm telling him no, I don't want to do this.
19 This is not what I'm here for, then yes. Is it to
20 the extreme that St. Louis was? No, obviously
21 not.

22 Q. Why obviously not?

23 A. Because that had a lot force and
24 aggression, and me being extremely physically hurt